

1 JENNER & BLOCK LLP  
2 Reid J. Schar (*pro hac vice*)  
3 RSchar@jenner.com  
4 353 N. Clark Street  
5 Chicago, IL 60654-3456  
Telephone: +1 312 222 9350  
Facsimile: +1 312 527 0484

6 CLARENCE DYER & COHEN LLP  
7 Kate Dyer (Bar No. 171891)  
kdyer@clarencedyer.com  
8 899 Ellis Street  
San Francisco, CA 94109-7807  
Telephone: +1 415 749 1800  
Facsimile: +1 415 749 1694

10 CRAVATH, SWAINE & MOORE LLP  
11 Kevin J. Orsini (*pro hac vice*)  
korsini@cravath.com  
12 825 Eighth Avenue  
New York, NY 10019  
13 Telephone: +1 212 474 1000  
Facsimile: +1 212 474 3700

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15 Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

16  
17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,

20 Case No. 14-CR-00175-WHA

21 Plaintiff,

**FURTHER SUBMISSION IN  
RESPONSE TO QUESTION 2 IN  
ORDER FOR FURTHER RESPONSES  
RE DIXIE FIRE**

22 v.

23 PACIFIC GAS AND ELECTRIC COMPANY,

24 Defendant.  
25

Judge: Hon. William Alsup

1                   Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this  
2 further response to Question 2 in the Court’s September 14, 2021 Order for Further Responses re  
3 Dixie Fire (Dkt. 1470), as clarified in the Court’s October 28, 2021 Fourth Further Request re Dixie  
4 Fire (Dkt. 1499).

5                   **Question 2:**

6                   *As a single exhibit, provide all PG&E (and partner, contractor, etc.)  
7 internal emails, texts, memos, and other documents created on July 13 or  
8 14, 2021, pertaining to the July 13 incident on the Bucks Creek 1101 line,  
9 and separately summarize them.*

10                  The Court’s October 28, 2021 order included the following clarifying language with  
11 respect to Question 2:

12                  *By way of clarification, please submit a summary of the files submitted  
13 in response to Question 2 with each submission, not at the conclusion  
14 of all submissions (see Dkt. No. 1491 at 3).*

15                  **PG&E Further Response:**

16                  Consistent with PG&E’s September 24, 2021 submission (Dkt. 1479) and its  
17 November 4, 2021 submission (Dkt. 1505), PG&E is delivering to the Court on November 18, 2021  
18 a thumb drive containing electronic copies of 252 documents bearing Bates PGE-DIXIE-NDCAL-  
19 000022755 to PGE-DIXIE-NDCAL-000023220 that PG&E has identified as responsive to this  
20 request.<sup>1</sup> These documents include emails, messages, and other documents from July 13-14, 2021  
21 that have been collected from Custodians, as well as non-custodial documents, as described in  
22 PG&E’s September 24, 2021 submission. (See Dkt. 1479 at 4-5.) As with the thumb drives PG&E  
23 submitted on September 28, October 12, and November 4, 2021, PG&E is not able to provide the  
24 documents as a single exhibit because the documents are different file types, some of which are

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<sup>1</sup> As set forth in PG&E’s September 24, 2021 submission, PG&E does not interpret the Court’s  
26 question as calling for information protected by the attorney-client privilege or attorney work  
27 product protection. Where applicable, PG&E is redacting portions of documents determined to be  
protected by attorney-client privilege or to constitute attorney work product.

1 produced as PDF images (e.g., .msg, .rsmf, and .png files) and some of which are produced in native  
2 format (e.g., .xlsx files). To facilitate the Court's review, the thumb drive includes (1) a combined  
3 PDF of the entire production, with slipsheets for documents being produced in native format, and (2)  
4 an index identifying the Bates range and custodian(s) for each document family in the production.

5 As set forth in PG&E's September 24, 2021 submission, certain documents being  
6 provided to the Court contain personally identifying information and other confidential information.  
7 PG&E is in the process of identifying this confidential information and will prepare and deliver a  
8 redacted set.

9 Pursuant to the clarification in the Court's October 28, 2021 order, PG&E is also  
10 submitting on a separate thumb drive an excel chart containing a summary of documents submitted  
11 as of November 18, 2021 in response to this request. PG&E previously provided, in its November 4,  
12 2021 submission (Dkt. 1505), a description of the columns in the chart and a brief description of the  
13 document categories referenced therein.

14 With the additional documents being delivered to the Court on November 18, 2021,  
15 PG&E has produced 2,972 documents in response to this request. The efforts that PG&E undertook  
16 to locate and produce documents responsive to this request are set forth in PG&E's September 24,  
17 2021 submission (Dkt. 1479); PG&E ultimately collected and reviewed documents from a total of 80  
18 Custodians and 32 Mobile Custodians. PG&E has now produced all documents that it has collected  
19 and identified as responsive to this request.

1 Dated: November 18, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

3  
4 By: /s/ Reid J. Schar  
Reid J. Schar (*pro hac vice*)

5 CRAVATH, SWAINE & MOORE LLP

6  
7 By: /s/ Kevin J. Orsini  
Kevin J. Orsini (*pro hac vice*)

8  
9 CLARENCE DYER & COHEN LLP

10  
11 By: /s/ Kate Dyer  
Kate Dyer (Bar No. 171891)

12  
13 Attorneys for Defendant PACIFIC GAS AND  
14 ELECTRIC COMPANY